

Page 1 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination Complaint Form, Consent Form, and Complaint Processing Procedures

DISCRIMINATION COMPLAINT FORM
to the
United States Department of Education
Office for Civil Rights

1. Name of person filing this complaint:

Last Name, First, Middle

Swain, Lauren

Address:

8532 N. Ivanhoe St., #208

City, State, Zip Code:

Portland, OR 97203

Home/Work Telephone:

Email Address:

2. Name of person discriminated against (if **other** than person filing). If the person discriminated against is age 18 or older, we will need that person's signature on this complaint form and the consent/release form before we can proceed with this complaint. If the person is a minor, and you do not have the legal authority to file a complaint on the student's behalf, the signature of the child's parent or legal guardian is required.

Last Name, First, Middle

Hargrove, Kalie

Address:

City, State, Zip Code:

Home/Work Telephone:

Email Address:

3. OCR investigates discrimination complaints against institutions and agencies which receive funds from the U.S. Department of Education and against public educational entities and libraries that are subject to the provisions of Title II of the Americans with Disabilities Act. Please identify the institution or agency that engaged in the alleged discrimination. If we cannot accept your complaint, we will attempt to refer it to the appropriate agency and will notify you of that fact.

Name of Institution:

Lincoln Christian University

Address:

100 Campus View Dr.

City, State, Zip Code:

Lincoln, IL 62656

Department/School:

Administration

4. The regulations OCR enforces prohibit discrimination on the basis of race, color, national origin, sex, disability, age or retaliation. Please indicate the basis of your complaint:

- ☐ Discrimination **based on sex (specify)**

Discrimination on the basis of sexual orientation and gender identity

Page 2 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination
Complaint Form, Consent Form, and Complaint Processing Procedures

5. Please describe each alleged discriminatory act. For each action, please include the date(s) the discriminatory act occurred, the name(s) of each person(s) involved and, why you believe the discrimination was because of race, disability, age, sex, etc. Also please provide the names of any person(s) who was present and witnessed the act(s) of discrimination.

On August 26 2021, Lincoln Christian University (LCU) Vice President Jill Dicken sent Kalie an official letter (see attached exhibit) stating that because LCU had come to believe that she had "chosen to identify and live as a transgender woman" that her "lifestyle choices do not comply with our behavioral expectations," and thereby requiring Kalie to choose between continuing enrollment and being referred to the Disciplinary Committee or dropping her classes. Please see the attached declaration and exhibit for more details.

6. What is the most **recent date** you were discriminated against?

Date: Current, Ongoing

7. If this date is **more than 180 days ago**, you may request a waiver of the filing requirement.

NA I am requesting a waiver of the 180-day time frame for filing this complaint.

Please explain why you waited until now to file your complaint.

8. Have you attempted to resolve these allegations with the institution through an internal grievance procedure, appeal or due process hearing?

No

If you answered **yes**, please describe the allegations in your grievance or hearing, identify the date you filed it, and tell us the status. If possible, please provide us with a copy of your grievance or appeal or due process request and, if completed, the decision in the matter.

Not applicable

9. If the allegations contained in this complaint have been filed with any other Federal, state or local civil rights agency, or any Federal or state court, please give details and dates. We will determine whether it is appropriate to investigate your complaint based upon the specific allegations of your complaint and the actions taken by the other agency or court.

Page 3 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination
Complaint Form, Consent Form, and Complaint Processing Procedures

10. If we cannot reach you at your home or work, we would like to have the name and telephone number of another person (relative or friend) who knows where and when we can reach you. This information **is not required**, but it will be helpful to us.

Not applicable

11. What would you like the institution to do as a result of your complaint — what remedy are you seeking?

Kalie would also like LCU's policies amended to state that (1) same-sex dating relationships and displays of affection will be treated by LCU in the same manner as opposite-sex dating relationships and displays of affection; (2) students will not be punished for coming out as LGBTQ+ or for expressing their sexual or gender identity (through pronouns, clothing, hair, makeup, etc.); (3) LCU will not encourage or facilitate conversion therapy or any other sexual or gender orientation change efforts; (4) students who report sexual or physical assault will be granted safe harbor from discipline relating to sexual activity or other code of conduct violations; and (5) LCU's non-discrimination policy includes sexual orientation and gender identity as applied to all aspects of LCU including housing and other programs.

Compensation for emotional distress and economic consequences of expulsion.

12. We cannot accept your complaint if it has not been signed. Please sign and date your complaint below.

10/28/2021

(Date)

Oct 28, 2021

(Date)



(Signature)



(Signature of person in Item 2)

CONSENT FORM - FOR REVEALING NAME AND PERSONAL INFORMATION TO OTHERS

(Please print or type except for signature line)

Your Name: Kalie Hargrove

Name of School or Other Institution That You Have Filed This Complaint Against: _____

Lincoln Christian University

- This form asks whether the Office for Civil Rights (OCR) may share your name and other personal information when OCR decides that doing so will assist in investigating and resolving your complaint.
- For example, to decide whether a school discriminated against a person, OCR often needs to reveal that person's name and other personal information to employees at that school to verify facts or get additional information. When OCR does that, OCR informs the employees that all forms of retaliation against that person and other individuals associated with the person are prohibited. OCR may also reveal the person's name and personal information during interviews with witnesses and consultations with experts.
- If OCR is not allowed to reveal your name or personal information as described above, OCR may decide to close your complaint if OCR determines it is necessary to disclose your name or personal information in order to resolve whether the school discriminated against you.

NOTE: If you file a complaint with OCR, OCR can release certain information about your complaint to the press or general public, including the name of the school or institution; the date your complaint was filed; the type of discrimination included in your complaint; the date your complaint was resolved, dismissed or closed; the basic reasons for OCR's decision; or other related information. Any information OCR releases to the press or general public will not include your name or the name of the person on whose behalf you filed the complaint.

NOTE: OCR requires you to respond to its requests for information. Failure to cooperate with OCR's investigation and resolution activities could result in the closure of your complaint.

Please sign section A or section B (but not both) and return to OCR:

- If you filed the complaint on behalf of yourself, you should sign this form.
 - If you filed the complaint on behalf of another specific person, that other person should sign this form.
- EXCEPTION:** If the complaint was filed on behalf of a specific person who is younger than 18 years old or a legally incompetent adult, this form must be signed by the parent or legal guardian of that person.
- If you filed the complaint on behalf of a class of people, rather than any specific person, you should sign the form.

A. I give OCR my consent to reveal my identity (and that of my minor child/ward on whose behalf the complaint is filed) to others to further OCR's investigation and enforcement activities.

Kalie Hargrove

Signature

Oct 28, 2021

Date

OR

B. I do not give OCR my consent to reveal my identity (and that of my minor child/ward on whose behalf the complaint is filed) to others. I understand that OCR may have to close my complaint.

Signature

Date

2. I am a resident of Decatur, Georgia.
3. I was formerly a student at Lincoln Christian University (“Lincoln”) located in Lincoln, Illinois.
4. I attended Lincoln from 2009 to 2010, and from 2019 to 2021.
5. I am pursuing a Master of Divinity degree.
6. I am 34 years old.
7. I am transgender and use she/her/hers pronouns.
8. I am a federal taxpayer and a U.S. Military Veteran.
9. While attending Lincoln Christian University (“Lincoln”) from 2019 to 2021 I received federal financial aid through the Montgomery GI bill.
10. I started my degree with Lincoln in 2009–10. After three semesters I put my education on hold to join the military in part to provide for my wife and child.
11. I served just under nine years as a member of the United States Air Force. I was honorably discharged.
12. I resumed taking classes at Lincoln in the fall of 2019 while I was still in the Airforce, taking two classes per semester. I completed my military service in 2020, and in the fall of 2020, I began attend Lincoln full time to finish my degree.
13. I did not accept to myself that I was transgender until after I had registered for classes in 2019. When I did accept it, I still didn’t know what to do. Accepting is one thing, knowing what to do is another. I did not begin transitioning until April of 2020.
14. On August 26th of 2021 I received an official email from Lincoln Christian University which stated that due to the contents of a blog post that I had written, the biographical information on the website of the church where I was interning, and the wording of the academic reports filed by my supervisor, that the school had come to believe that I had “chosen to identify and live as a transgender woman.” (See Exhibit A, Notice of Charge, V.P. Jill Dicken) The letter stated that the University’s Graduate and Seminary Handbook says that “[g]ender modification or medical procedures to become transgender are considered sexual immorality. Id. Similarly, cross-dressing for the purpose of presenting oneself as an opposite gender is considered inappropriate.” Id. As a result Lincoln had determined my “lifestyle choices do not comply with our behavioral expectations.” Id.

2 DECLARATION OF KALIE HARGROVE

15. Lincoln presented me with a choice: I could remain enrolled and “be referred to the Disciplinary Committee for further action,” or I could drop my classes and “no further action [would] be taken.” Id.

16. When I was beginning the process of coming out to people as transgender in the spring of 2021 I had looked to see if the school was a Title IX school, because I assumed that if it were Title IX would protect me against discrimination. I was relieved to find out they were. I believed that Title IX overruled anything in the handbook. While I knew that some religious schools do discriminate against LGBTQ+ people, I assumed they were able to do that because they did not get government funding through Title IX, and that any Title IX school couldn’t discriminate. It wasn’t until I heard news of this lawsuit that I realized that a religious exemption existed which might apply to me. It was an ‘oh crap’ moment for me.

17. I finance my education using the GI Bill. If I don’t pass my classes, or get good enough grades, or don’t complete the semester for some reason, I would have to repay the government, which in my case would have been over \$7,000 for the fall 2021 semester. I could not afford taking the risk of signing up for classes and then being expelled, requiring me to pay back my government funding.

18. I only briefly entertained the idea of appearing before the school’s disciplinary committee as I was being charged with being transgender, and I am transgender. I could not argue that I was not. There did not seem to be any hope in fighting that. I faced a decision to either detransition and denounce who I am, drop classes, or face disciplinary actions. I chose to drop my classes.

19. To appear before a disciplinary committee would have been an incredibly hostile position to put myself in. To put yourself in front of a group of people who will look at you as an unrepentant sinner, who reject who you are, that is not a situation I should be in, and I decided not to. This was more than just academic discipline for me. You must understand that this is the tradition I grew up in, 18 years of my life in my parents’ house was being part of this Christian church, 4 years of bible college at an independent Christian church college. This had been the sole tradition I had been in for over 30 years of my life. I faced the rejection and censure of not just the school because the school’s rejection sent a message to my community that somehow I had failed in, or was not worthy of, my calling to the ministry.

3 DECLARATION OF KALIE HARGROVE

20. Being un-affirming of a trans person is to say they don't have agency to tell you who they are. They are telling trans persons that they feel their agency as a person, what gives them an identity, that those un-affirming people know them better than they know themselves. It is dehumanizing on the most fundamental level, and to have universities reinforce that type of ideology and back it, they are reinforcing and enabling the dehumanization of people. And it sucks.

21. I am still not over the emotional and mental harm. There are a lot of painful emotions that come from being discriminated against. Traumatic experiences don't simply go away. I began to feel uncertain about continuing my ministry, which is both my calling and my chosen career, due to the emotional impacts of this event.

22. When news of my story grew, another university fortunately offered to accept me, but not all my credits will transfer. I was desperate and was considering giving up entirely on my career. I was on track to graduate in spring of 2022, and that will be delayed at least one semester, which also forecloses or delays employment opportunities post-graduation. There is a massive shame in starting a process to become a minister and not finishing.

23. My new divinity school is LGBTQ+ affirming, but I feel fear and anxiety thinking that the religious exemption might still apply here, and my standing in the school could change at any moment, and I would have no legal recourse.

24. Some of my taxes goes to Title IX schools, which means that some of my tax money goes to a school that kicked me out and discriminated against me, and my money is currently actively supporting them. I am in a sense funding my own discrimination.

25. I feel like I am being screwed over by my government. It feels like the government is funding what should be a hate crime.

26. When your government doesn't see you as a person, it is really dehumanizing. I had believed I was promised protection from discrimination through Title IX, and Title IX is in the handbook. They say they don't discriminate according to Title IX.

27. That government allows and funds this discrimination feels like the Government doesn't see you as a full person. They say they are against discrimination against people, but they allow it against you, so the implication is you are not full people. There is so much in the world that makes LGBT persons feel dehumanized, and the way the Government handles Title IX is just another way we are made to feel less than.

4 DECLARATION OF KALIE HARGROVE

28. It had appeared that the U.S. Government had said that discrimination against gender identity and sexual orientation is not permitted based on recent Supreme Court rulings, and the Biden administration made it the official position of the U.S. Government for Title IX, but then they kind of just throw that out the window. A school is like no, we are religious, we can actively discriminate and carry out hate against LGBTQ people, and the government turns a blind eye.

29. I would likely have signed a student handbook when I had started attendance in 2009, but I didn't know I was transgender at that point, so I had not carefully scrutinized their sex discrimination policy fine print. I was married, I thought I was a cisgender guy, I had kids, I wasn't engaged in an affair. I simply would have never considered it applied to me. If someone puts in a handbook don't chew gum while on the moon you don't think about it, as it seems inapplicable to you.

30. It is dehumanizing to say that my experience of being discriminated is not valid because it was motivated by religious belief. That my experience as a human is not a real experience because it happened within their legal understanding of saying it is legally okay to religiously discriminate. Religious freedom has to go both ways. My religious freedom wasn't used to discriminate against the school, I never did anything that took away their religious freedom. They took away my religious freedom and education.

31. If the government is going to say that they have a choice between protecting LGBTQ students or religious organizations that actively discriminate against LGBTQ people, and actively fund those organizations, they are backing those organizations and taking sides. The government funding ensures that these entities can continue their discrimination.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 27th day of October 2021.

By: /s/ Kalie Hargrove
Kalie Hargrove

5 DECLARATION OF KALIE HARGROVE



August 26, 2021

Caley:

As is stated in our Graduate and Seminary Handbook, Lincoln Christian University is a Christian community committed to academic pursuit and spiritual growth under the Lordship of Jesus Christ and as such, all members of this community agreed to live within the boundaries established in the Handbook.

I recognize that this is a tender and sensitive topic, but it has come to my attention that you have made lifestyle choices that do not comply with our behavioral expectations. According to a blog post you contributed to *Whosoever* on June 23, 2021 and your biographical information on the First Christian Church website, it seems you have chosen to identify as and live as a transgender woman. Our Graduate and Seminary Handbook clearly states:

Section 350: Sexual Immorality

Sexual immorality is prohibited by God's Word, and therefore by the University. This includes premarital sex, extramarital sex, homosexual activity, gender modification, and any other sexual activity outside the bounds of a Biblical marriage. It also includes erotic physical contact outside the traditional definition of sexual intercourse.

Homosexuality is defined as romantic, physical, or sexual attraction to a member of the same gender. Homosexual activity is defined as romantic, physical, or sexual acts with a member of the same gender. Gender is defined as a person's physical condition as male or female at birth. Gender modification or medical procedures to become transgender are considered sexual immorality. Similarly, cross-dressing for the purpose of presenting oneself as an opposite gender is considered inappropriate.

Please note that being attracted to a member or members of the same sex is not a disciplinary matter under this Handbook. However, in light of our understanding of Biblical teaching regarding human sexuality, acting on these attractions will be treated as a disciplinary issue under this Handbook.

Even though a Biblical worldview does not support homosexual activity or an elected transgender lifestyle, it also clearly promotes general respect for and tolerance of people who do not share a Biblical worldview or interpret pertinent Biblical texts in a manner that is inconsistent with orthodox Christian scholarship.

In addition, the most recent Mentored Ministry reports submitted on your behalf are written in a way to conceal your choice to live as a woman. The reports are written awkwardly in an attempt to not use pronouns when speaking about your work at the church. This is a cause of concern as they seem to have been written and submitted to be intentionally less than forthright.

We desire that any action taken by LCU be done so with the best interest of the student and community in mind. Any action we take is not undertaken to be punitive, but instead used as an opportunity for growth. Our redemptive process is in place to call members of our community to a high standard of

behavior and to establish and maintain an environment conducive to learning and personal growth. As an LCU student you are agreeing to live by our community standards.

If you choose to remain enrolled at LCU, this matter will be referred to the Disciplinary Committee for further action. Please find our due process information below so you can be fully informed regarding the steps that will be taken.

If, for any reason, you were unaware of our stance on gender and now recognize that you cannot abide by our conduct expectations, you may simply withdraw from classes and no further action will be taken. Students may drop classes anytime before September 6 and receive a full refund. If you choose to withdraw from your classes, you should contact the Registrar's Office (registrar@lincolncchristian.edu).

Please acknowledge receipt of this Notice of Charge by responding via email. As you'll note below, if you would like to be heard by the Disciplinary Committee, you may submit a request to me within fourteen (14) days of receipt of this Notice. If you do not request to be heard and you do not voluntarily choose to withdraw from your courses, this matter will be presented to the Disciplinary Committee for further action.

We seek to find a redemptive and respectful conclusion to this matter. If you would like to speak to me or to Dr. Barney Wells, Graduate and Seminary Dean about this matter, please let us know.



Jill Dicken
Vice President of Student Development

Section 415: Due Process

A student who is subject to any disciplinary action as outlined in this Handbook and who is not suspected or determined as provided elsewhere to be a direct threat to self or others has the following, and only the following, rights:

Formal Actions. Before being subjected to any Formal Actions, a student is entitled to written Notice of Charge and may, upon request, be heard by and personally appear before the Disciplinary Committee. Such a request must be made to the Vice President of Student Development in writing within fourteen (14) days of the Notice of the Charge. The Vice President of Student Development may, in her sole discretion, choose to submit the matter to the Disciplinary Committee for decision. The Disciplinary Committee will have ten (10) days to render a decision.

Appeal of Disciplinary Committee Actions. A student may appeal Informal or Formal Actions taken by the Disciplinary Committee as follows: an appeal may be made to the President, or his designee. The President, or his designee, may, in his sole discretion, grant the student an opportunity to appear in person and be heard. Appeals must be made in writing and within fourteen (14) days of the decision being appealed. The response to the appeal must be made within ten (10) days of the appeal.

Appeals are Successive. Note that these appeals are successive, meaning that, for example, informal action by a Residence Hall Director must first be appealed to the Vice President of Student Development, and a denial of that appeal by the Vice President must then be appealed to the Disciplinary Committee, and a denial of that appeal by the Disciplinary Committee must then be appealed to the President.

Disciplinary Committee Hearings. If a student appears before the Disciplinary Committee, the student may personally appear before and be heard by the Disciplinary Committee and may make a statement and respond to committee questions. A student is **not** entitled to (though may be permitted upon request) present evidence, cross examine witnesses, or be represented by legal counsel.



**UNITED STATES DEPARTMENT OF EDUCATION
OFFICE FOR CIVIL RIGHTS**

230 SOUTH DEARBORN ST., 37TH FLOOR
CHICAGO, IL 60604

REGION V
ILLINOIS
INDIANA
IOWA
MINNESOTA
NORTH DAKOTA
WISCONSIN

January 7, 2022

Ms. Lauren Swain
8532 N. Ivanhoe St., Suite 203
Portland, OR 97203

Sent via email only to: [REDACTED]

OCR Case No. 05-22-2023

Dear Ms. Swain:

The U.S. Department of Education, Office for Civil Rights (OCR), has completed its evaluation of the complaint you filed against Lincoln Christian University (University) on October 28, 2021. You allege that in August 2021, the University discriminated against Kalie Hargrove (Student A) on the basis of sex (gender identity) by directing her either to withdraw from classes or face discipline because she publicly identified as transgender.

OCR enforces Title IX of the Education Amendments of 1972 (Title IX), 20 U.S.C. §§ 1681 - 1688, and its implementing regulation at 34 C.F.R. Part 106, which prohibit discrimination on the basis of sex in any education program or activity operated by a recipient of Federal financial assistance. As a recipient of Federal financial assistance from the Department, the University is subject to Title IX. Title IX and its implementing regulation contain several exemptions and exceptions from their coverage. *See* 20 U.S.C. §§ 1681(a)(1)-(9); 34 C.F.R. §§ 106.11-106.15; *see also* OCR's [webpage on exemptions from Title IX](#). The University may claim an exemption from the application of Title IX and its implementing regulation to this complaint by contacting OCR.

OCR is opening an investigation into the complaint. Please understand that opening an investigation does not mean that OCR has made a decision about the complaint. During the investigation, OCR is neutral; OCR will collect and analyze the evidence it needs in order to make a decision about the complaint. OCR will ensure that its investigation addresses the complaint allegation and complies with OCR's *Case Processing Manual*.¹

Individuals who file complaints with OCR may have the right to file a private suit in federal court whether or not OCR finds a violation.

It is also important for you to understand that the laws OCR enforces prohibit the University from harassing, coercing, intimidating, discriminating, or otherwise retaliating against you

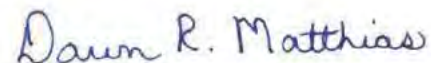
¹ <https://www2.ed.gov/about/offices/list/ocr/docs/ocrcpm.pdf>

Page 2

because you filed a complaint or participated in the complaint resolution process. If this happens, you may file another complaint with OCR.

We will communicate with you periodically regarding the status of your complaint. If you have any questions about this letter, you may contact Michael O'Donnell, Senior Attorney, at michael.odonnell@ed.gov.

Sincerely,

A handwritten signature in blue ink that reads "Dawn R. Matthias". The signature is written in a cursive, flowing style.

Dawn R. Matthias
Team Leader



January 27, 2022

Ms. Catherine Lhamon, Assistant Secretary for Civil Rights
U.S. Department of Education, Office for Civil Rights
Lyndon Baines Johnson Department of Education Building
400 Maryland Avenue, SW
Washington, D.C. 20202-1100

Re: Lincoln Christian University's Request for Title IX Religious Exemption

Dear Ms. Lhamon,

REQUEST

I write to request, that under 20 U.S.C. § 1681(a)(3) and 34 C.F.R. § 106.12, the Department of Education's Office for Civil Rights acknowledge that Lincoln Christian University is exempt from Title IX of the Education Amendments of 1972 and its accompanying regulations, to the extent that they are interpreted to curtail Lincoln Christian University's freedom to act in accordance with its religious convictions. As President of Lincoln Christian University, I am the "highest ranking official of the institution," 34 C.F.R. § 106.12(b), and thus qualified to seek these exemptions.

BACKGROUND

Incorporated as Lincoln Bible Institute in 1944, our stated purpose was:

"To establish, maintain, and conduct, an institution of learning at Lincoln, Illinois, for the advancement of education in arts, science, language, and theology, and especially for instruction in the New and Old Testaments of the Holy Scriptures, which shall be designed to encourage and qualify young men and young women to make the Christian Religion their life work, either as ministers, missionaries or church workers in the Churches of Christ, together with such other courses of instruction as the Board of Trustees shall deem advisable, provided, however such institution shall at all times be independent, separate and apart from all other agencies."¹ Though worded a bit differently – and more succinctly – today, this remains our purpose. Our present mission is stated this way, "Lincoln Christian University is a Christian higher education community whose mission is to nurture and equip Christians with a Biblical worldview to serve and lead in the church and the world."²

Our core institutional values reflect our purpose and mission:

"We believe our highest privilege is to glorify God, serve His Son, and rely upon His Holy Spirit. To that end we pledge ourselves to these core values:

- a. *Authentic community* that fosters Christian character, conduct, accountability, and unity amidst growing diversity.
- b. *Holistic development* of students in and out of the classroom as spiritually mature and academically prepared lifelong learners.
- c. *Servant leadership* and its focus on leading and learning through serving, based on one's gifts, passion, and sense of calling.

¹ See Attachment A: Articles of Incorporation.

² See Attachment B: Mission Statement, Core Values, and Statement of Faith.

- d. *Responsible stewardship* of the abilities and resources that God provides for and through His people.
- e. *Our Restoration heritage* and its plea for Christian unity and Biblical authority in carrying out God's global mission."³

And, finally, our Statement of Faith identifies the core beliefs from which our purpose, mission, and values arise:

"Lincoln Christian University is a private religious institution affiliated with independent Christian Churches and Churches of Christ. These churches arose from the "Restoration Movement" begun in the early 19th century on the American frontier under the leadership of such men as Barton Stone and Alexander Campbell. Churches within the Stone-Campbell heritage seek to honor Jesus' prayer in John 17, promoting world evangelism by practicing unity in the church based upon the restoration of Biblical authority and the essential elements of New Testament Christianity. This movement refuses to embrace extra-biblical creeds as tests of fellowship, standing on the Scriptures alone as the foundation for faith and practice. Furthermore, each congregation is self-governing under Christ, so individual churches may differ from one another on non-essentials. Therefore, the statements that follow are descriptive, not creedal—designed to help people understand the positions generally held by Christian Churches and Churches of Christ, including Lincoln Christian University. We believe that:

- **God** is one being in three persons—God the Father, God the Son, and God the Holy Spirit. He is the source of all creation (Gen. 1:1; John 1:1-2), which He sustains (Col. 1:17) and is in the process of redeeming (Rom. 8:19-22). God the Father loves us and desires that we have fellowship with Him as His children (1 John 1:3).
- **Jesus** of Nazareth is the incarnation of God the Son. He is the Word become flesh (John 1:14), and He now holds all authority in heaven and on earth (Matt. 28:18). He is Savior and Lord. He made human salvation possible through His life, death on the cross, and resurrection. He ascended into heaven where He is now our high priest and advocate. He is head of the Church.
- **The Holy Spirit** works actively in the world, seeking to glorify Jesus. The Holy Spirit convicts people of sin, righteousness, and judgment to come (John 16:5-11). The Holy Spirit indwells believers individually and corporately in the Church. The Holy Spirit develops within the Christian a pure heart which results in Christ-like character expressed in private and public conduct and action.
- **The Bible**, the Old and New Testament Scriptures, is the uniquely inspired Word of God (2 Tim. 3:14-17; 2 Peter 1:16-21). The Bible is the rule of faith and practice for Christians. We affirm that Scripture is the authoritative revelation from God by which we know God's will and Christ's authority. We seek to assert what the Scriptures clearly assert and allow freedom in other cases. We seek to understand divine intent, through authorial intent, and we seek to apply its teaching to the contemporary church and culture.
- **The Church** is the body of Christ on earth, the community of believers throughout the world. Upon surrender to Christ, a person is added to the Church. In addition, the priesthood of all believers means each Christian is called to be a serving minister (1 Peter 2:9-10). The Church's mission is the Great Commission (Matt. 28:18-20).
- **Human beings** were created by God to walk in fellowship with Him. However, all (except Jesus) have sinned and fall short of the glory of God (Rom. 3:23) and must rely on God's grace and forgiveness. Every human from the moment of life is in the image of God (*imago dei*), a person to be nurtured, protected, and developed.
- **Salvation** is by God alone through Jesus Christ alone. One accepts Christ as Savior through a conversion process that includes faith, repentance, confession, and baptism (Acts 2:38, 8:12, 10:47-48, Rom. 10:9, etc.).

³ See Attachment B: See Attachment B: Mission Statement, Core Values, and Statement of Faith.

- In **baptism** a believer is immersed, crucified and buried with Christ (Rom. 6:3-4), receives forgiveness of sin and the gift of the Holy Spirit (Acts 2:38), is resurrected (Col. 2:12) and clothed with Christ (Gal. 3:27), and becomes saved (1 Peter 3:21) because of God's free gift of grace received by faith.
- **The Lord's Supper** is the celebration of the New Covenant, in which the Christian community remembers Christ and celebrates the covenantal relationship they have with Him and with each other. Congregations in this fellowship typically celebrate the Lord's Supper at least weekly (1 Cor. 11:17-34; Acts 20:7).
- **The Final Coming** of Jesus is a time when Christ will personally come again as savior and judge of the world. At that time there will be the bodily resurrection of the dead—believers to eternal life with God and unbelievers to eternal judgment. Sin will be no more and believers will live in fellowship with God forever (I Thess. 4:13-18 and Rev. 20:11-15).⁴

Every trustee, employee (faculty or otherwise), and student, is required to make a profession of faith in Christ as a requirement of admission, employment, or affiliation, and all are required to be an active member of a church.⁵

RELIGIOUS BELIEFS AND THEIR APPLICATION

Beliefs

All universities have behavioral expectations of their students, and that is true of us as well, but unique to us because of our purpose, mission, core values, and statement of faith, is the fact that most of our beliefs, practices, and policies are unavoidably linked to our interpretation of scripture. In our tradition, scripture is the primary means of God's revelation. We also recognize the other three means that complete what is known as the Wesleyan Quadrilateral: reason, tradition, and experience, but believe each of them to be subservient to the text. To put in in terms that might be more familiar to a lawyer, we see the text as mandatory authority, and reason, tradition, and experience as persuasive authority. They are critical for filling in gaps, providing nuance, and the like, but they cannot overrule the text. This position arises from our belief that scripture is divinely inspired, and that reason, tradition, and experience are simply too subject to human frailty to enjoy the same level of authority as the text. This position is distinct from many other faith traditions that place all four means on an equal playing field and thus can reach very different conclusion about the same matters.

It is because of our belief that scripture is divinely inspired, mandatory authority, that we take its admonitions very seriously. And some of the protections that have been held to exist in Title IX, particularly for LGBTQ+ students, conflict fundamentally with our religious beliefs.

First, in our faith tradition, our identity is found in our acceptance or rejection of Jesus Christ. Our race, ethnicity, who we are sexually attracted to, height, past experiences, future prospects, and any and all other of the many ways in which we, as human beings, are able to categorize ourselves certainly exist, but they are not core to our identity.⁶ Thus we believe that being required to adopt Title IX's interpretation of identity as including sexuality would be inconsistent with our Christian understanding of identity.

Second, in finding our identity in Christ, scripture calls us to be devoted to a lifetime of becoming more like Him, and less like who we are at the beginning of our faith journey. It is stated in

⁴ See Attachment B: See Attachment B: Mission Statement, Core Values, and Statement of Faith.

⁵ Attachment C: Policies (Undergraduate Handbook, Section 200; Graduate and Seminary Handbook, Section 200; Staff Handbook, Section 3.4; Faculty Handbook, Section 3.5; Board Policy Category 2, Document 1).

⁶ See, for example, Ephesians 1:3-14 and Galatians 3:23-28.

different ways in scripture, but it is most clearly stated by Jesus in Matthew chapter 16, verses 24 through 26, when he says that to follow Him, one must “deny himself and take up his cross and follow me.” Or, as the Apostle Paul says it in 1 Corinthians, chapter 15, verse 31, “I die every day!” Thus, we believe that Title IX prohibiting us from expecting any of our students to refrain from engaging in activities not permitted by scripture would be inconsistent with our understanding of Christian faith formation.

Third, in seeking to live less like us and more like Christ, we look primarily to scripture to see how to do that. Sexual activity is one of the aspects of life that we believe scripture informs – though it is by no means the only one. Our marriages, our work, our children, our financial resources, the way we treat others – particularly the poor and vulnerable, are all also subject to the teachings of scripture. With particular regard to Title IX, though, scripture is clear that God intends us to live as the man or woman He created, and that sexual activity between us is to take place, if at all, within a monogamous, marriage between one man and one woman, and violations of these expectations are routinely used as examples of what it means to reject God’s directives.⁷ It is also worth noting that many of the sexual ethics scripture teaches and that are built into our policies are not impacted by Title IX. Thus to the extent that Title IX would prohibit us from disciplining students who engage in romantic relationships, or sexual activity with member of the same sex, or reject these teachings and choose to transition from one sex to another, that would be inconsistent with our understanding of behavioral expectations for Christians.

Application

We only have a few policies that conflict with how Title IX is interpreted, although their application obviously cuts across a large swath of activities. The first is our Sexual Immorality policy found in our Student Handbooks (Section 350 in the Graduate and Seminary Student Handbook; Section 355 in the Undergraduate Student Handbook), the second is our Sexual Immorality policy found in our employee handbooks, particularly Sections 9.1 and 9.10 in the Faculty Handbook, and Sections 8.1 and 8.10 in the Staff Handbook. They are reproduced below.

Student Policy

“Sexual immorality is prohibited by God’s Word, and therefore by the University. This includes premarital sex, extramarital sex, homosexual activity, gender modification, and any other sexual activity outside the bounds of a Biblical marriage. It also includes erotic physical contact outside the traditional definition of sexual intercourse.

Homosexuality is defined as romantic, physical, or sexual attraction to a member of the same gender. Homosexual activity is defined as romantic, physical, or sexual acts with a member of the same gender. Gender is defined as a person’s physical condition as male or female at birth. Gender modification or medical procedures to become transgender are considered sexual immorality. Similarly, cross-dressing for the purpose of presenting oneself as an opposite gender is considered inappropriate.

Please note that being attracted to a member or members of the same sex is not a disciplinary matter under this Handbook. However, in light of our understanding of Biblical teaching regarding human sexuality, acting on these attractions will be treated as a disciplinary issue under this Handbook.

Even though a Biblical worldview does not support homosexual activity or an elected transgender lifestyle, it also clearly promotes general respect for and tolerance of people who do not share a

⁷ See, for example, Genesis 1:27-28, Genesis 2:24, 1 Corinthians 7:1-5 and Romans 1:18-32.

Biblical worldview or interpret pertinent Biblical texts in a manner that is inconsistent with orthodox Christian scholarship.”

Employee Policies

[Sections 8.1 and 9.1] “Scripture makes it clear that among Christians *“there must not be even a hint of sexual immorality, or of any kind of impurity . . . because these are improper for God’s holy people. Nor should there be obscenity, foolish talk or coarse joking, which are out of place”* (Ephesians 5:3-4). Any such behavior is also “out of place” in the Christian community of Lincoln Christian University and will be treated very seriously. Lincoln Christian defines sexual immorality as sexual activity in violation of the law, outside the marriage covenant, between members of the same sex, or otherwise in violation of Scripture (as determined by the Board of Trustees). This policy also prohibits use of pornography (including inappropriate web sites, with school computers monitored for such use) and sexual harassment.”

[Sections 8.10 and 9.10] “Below is a summary of the Sexual Misconduct and Sexual Violence policy and procedures. For the full policy and procedures for preventing and responding, contact the Human Resource Office, or view it on the LCU website (<https://lincolncchristian.edu/studentlife/campus-safety/>) or Employee Resource Intranet.

Lincoln Christian University (sometimes referred to herein as the “University” or “LCU”) strives to provide a safe environment in which students, employees and other members of the campus community can pursue their education and work free from the detrimental effects of sexual misconduct and sexual violence, including domestic violence, dating violence, sexual assault and stalking. Such actions, in any form, are prohibited and will not be excused or tolerated. Therefore, the University seeks to educate students and employees about these issues and to provide a means of recourse should a member of the campus community believe he or she has been the victim of sexual violence and/or sexual misconduct. When brought to the attention of the University, such actions will be appropriately responded to according to the procedures outlined in this policy.

Further, as a University that seeks to glorify God in every way, we seek to obey all of the teachings of the Bible on all issues, including human sexuality. All of those Biblical principles are incorporated into this policy even though not all of them are set forth word for word herein. The University deeply holds to the following religious beliefs: That sexual immorality as defined in the Bible is sin and should be fled from by all persons associated with the University. Sexual intimacy of any kind must be exclusively reserved for a marriage relationship where mutual love exists. We believe that the marriage relationship is defined by God as a lifelong committed and loving covenant relationship between one woman and one man. All other sexual intimacy outside of such a marriage relationship is sin. While avoiding sexual sin is the primary goal of this policy, the University acknowledges that no person associated with the University is without sin and that at some times and in some situations sexual intimacy may occur outside of Biblically accepted standards. This policy addresses these situations.

This policy strives to ensure that the campus community is knowledgeable about:

- procedures survivors should follow if sexual misconduct and sexual violence has occurred;
- how to report such offenses;
- definitions of behaviors that constitute sexual misconduct, including domestic violence, dating violence, sexual assault and stalking;
- ways to prevent or reduce the incidence of these behaviors;
- disciplinary procedures for and potential consequences of engaging in such acts.”

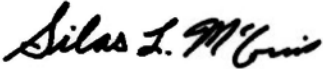
CONCLUSION

Therefore, Lincoln Christian University requests that your office acknowledge that the University is exempt from Title IX and the following implementing regulations to the extent they are interpreted to reach:

- 34 C.F.R. § 106.21 (Admission)
- 34 C.F.R. § 106.22 (Preference in Admission)
- 34 C.F.R. § 106.23 (Recruitment)
- 34 C.F.R. § 106.31 (Education Programs or Activities)
- 34 C.F.R. § 106.32 (Housing)
- 34 C.F.R. § 106.33 (Comparable Facilities)
- 34 C.F.R. § 106.34 (Access to Classes and Schools)
- 34 C.F.R. § 106.36 (Counseling)
- 34 C.F.R. § 106.37 (Financial Assistance)
- 34 C.F.R. § 106.38 (Employment Assistance to Students)
- 34 C.F.R. § 106.39 (Health and Insurance Benefits and Services)
- 34 C.F.R. § 106.40 (Marital or Parental Status)
- 34 C.F.R. § 106.41 (Athletics)
- 34 C.F.R. § 106.42 (Textbooks and Curricular Material)
- 34 C.F.R. § 106.51-61 (Relating to Employment)

Thank you for your attention to this matter.

Yours truly,

A handwritten signature in black ink that reads "Silas L. McCormick". The signature is written in a cursive, flowing style.

Silas L. McCormick, President
Lincoln Christian University

Attachment A: Articles of Incorporation

Certificate Number 329

To all to whom these Presents Shall Come, Greeting:

Whereas, *Articles of Incorporation*, duly signed and verified, of
LINCOLN BIBLE INSTITUTE

have been filed in the Office of the Secretary of State, on the 4th
day of May A. D. 1944, as provided by the "GENERAL NOT
FOR PROFIT CORPORATION ACT" of Illinois, approved July 17, 1943, in force
January 1, A. D. 1944;

Now Therefore, I, EDWARD J. HUGHES, Secretary of State, of the State of Illinois,
by virtue of the powers vested in me by law, do hereby issue this Certificate of
Incorporation, and attach thereto a copy of the Articles of Incorporation
of the aforesaid corporation.

In Testimony Whereof, *I hereto set my hand and cause to*
be affixed the Great Seal of the State of Illinois;
Done at the City of Springfield, this 4th
day of May A. D. 1944, and
of the Independence of the United States
the one hundred and 68th.

(SEA:

Edward J. Hughes

SECRETARY OF STATE

ARTICLES OF INCORPORATION
UNDER THE
GENERAL NOT FOR PROFIT CORPORATION ACT.

PAID

MAY 4-1944

B.B. 10-2

TO - HON. EDWARD J. HUGHES,
Secretary of State,
Springfield, Illinois. 521 MAY -4 44 22

RECEIVED

PAGE PAYMENT LINE

WE, THE UNDERSIGNED,

Edward J. Hughes
SECRETARY OF STATE

D. P. Coffman,	331 No. Union St.,	Lincoln, Ill.
Jesse Eury,	R.F.D. #1,	Lincoln, Ill.
Reuben Anderson,	548 S. State St.,	Springfield, Ill.
Harry Wheaton,		Clinton, Ill.
Roy Moore,	R.F.D.,	Mt. Pulaski, Ill.
Charles Scott,		Clinton, Ill.
Howard Yonaka,		Flora, Ill.
Orval Morgan,		Lexington, Ky.
Earl C. Hargrove,	208 8th St.,	Lincoln, Ill.

being natural persons of the age of twenty-one years or more and citizens of the United States, for the purpose of forming a corporation under the "General Not For Profit Corporation Act" of the State of Illinois, do hereby adopt the following Articles of Incorporation:

1. The name of the corporation is: Lincoln Bible Institute.
2. The period of duration of the corporation is: Perpetual.
3. The address of its initial Registered Office in the State of Illinois is: 208 8th Street, in the City of Lincoln, County of Logan and the name of its initial Registered Agent at said address is: Earl C. Hargrove.
4. The first Board of Directors shall be nine in number, their names and addresses being above named.
5. The purpose or purposes for which the corporation is organized, are:

To establish, maintain and conduct an institution of learning at Lincoln, Illinois, for the advancement of education in arts, science, language and literature, and especially for instruction in the New and Old Testaments of the Holy Scriptures, which shall be designed to encourage and qualify young men and young women to make the Christian Religion their life work, either as ministers, missionaries or church-workers in the Churches of Christ, together with such other courses of instruction as the Board of Trustees shall deem advisable, provided, however, such institution shall at all times be independent, separate and apart from all other agencies.

DFC D.P. Coffman
 JE Jesse Eury
 RA Reuben L. Anderson
 HW Howard H. Hargrove
 RM Roy Moore
 CM Charles Scott
 HY Howard H. Hargrove
 EM Earl M. Morgan
 ECH Earl C. Hargrove

Incorporators

STATE OF ILLINOIS)
COUNTY OF LOGAN) SS

I, Ray Eustace, a Notary Public
do hereby certify that on the 22nd day of April, 1944,
D. P. Coffman, Jesse Eury, Roy Moore and Earl C. Hargrove,
personally appeared before me and being first duly sworn by
me severally acknowledged that they signed the foregoing
document in the respective capacities therein set forth
and declared that the statements therein contained are true.
IN WITNESS WHEREOF I have hereunto set my hand and
seal the day and year above written.

Ray Eustace
Notary Public

STATE OF ILLINOIS)
COUNTY OF SANGAMON) SS

I, Charles C. McBrien, a Notary Public,
do hereby certify that on the 3rd Day of April, 1944,
Reuben Anderson, personally appeared before me and being
first duly sworn by me severally acknowledged that he signed
the foregoing document in the respective capacity therein
set forth and declared that the statements therein contained
are true.

IN WITNESS WHEREOF I have hereunto set my hand
and seal the day and year above written.

Charles C. McBrien
Notary Public

STATE OF ILLINOIS }
COUNTY OF DEWITT } SS

I, Edith M. Witt, a Notary Public do hereby certify that on the 7 day of April 1944, Harry Wheaton and Charles Scott, personally appeared before me and being first duly sworn by me severally acknowledged that they signed the foregoing document in the respective capacities therein set forth and declared that the statements therein contained are true.

IN WITNESS WHEREOF I have hereunto set my hand and seal the day and year above written.

Edith M. Witt
Notary Public

STATE OF ILLINOIS }
COUNTY OF CLAY } SS

I, Charles C. Snyder, a Notary Public do hereby certify that on the 17th day of April 1944, Howard Yonaka personally appeared before me and being first duly sworn by me severally acknowledged that he signed the foregoing document in the capacity therein set forth and declared that the statements therein contained are true.

IN WITNESS WHEREOF I have hereunto set my hand and seal the day and year above written.

Charles C. Snyder
Notary Public

STATE OF KENTUCKY }
COUNTY OF FAYETTE } SS

I, Bernice Caywood, a Notary Public do hereby certify that on the 12 day of April 1944, Orval Morgan personally appeared before me and being first duly sworn by me severally acknowledged that he signed the foregoing document in the capacity therein set forth and declared that the statements therein contained are true.

IN WITNESS WHEREOF I have hereunto set my hand and seal the day and year above written.

Bernice Caywood
Notary Public

My Commission Expires June 16, 1945

Certificate Number _____



To all to whom these Presents Shall Come, Greeting:

Whereas, *Articles of Amendment to the Articles of Incorporation*
duly signed and verified of
LINCOLN BIBLE INSTITUTE

have been filed in the Office of the Secretary of State on the 30th
day of December *A. D. 19*61*, as provided by the "GENERAL NOT*
FOR PROFIT CORPORATION ACT" of Illinois, approved July 17, 1943, in force
January 1, A. D. 1944.

Now Therefore, I, CHARLES F. CARPENTIER, Secretary of State of the State of Illinois,
by virtue of the powers vested in me by law, do hereby, issue, this Certificate of
Amendment, and attach thereto a copy of the Articles of Amendment to
the Articles of Incorporation of the aforesaid corporation.

In Testimony Whereof, *I hereto set my hand and cause to*
be affixed the Great Seal of the State of Illinois,
Done at the City of Springfield, this 30th
day of December *A. D. 19*61*, and*
of the Independence of the United States
the one hundred, and 86th.

Charles F. Carpentier

SECRETARY OF STATE



To Be Filed
In Duplicate
Filing Fee \$10.00

FORM NP-A

ARTICLES OF AMENDMENT
to the
ARTICLES OF INCORPORATION
under the
GENERAL NOT FOR PROFIT CORPORATION ACT

(DO NOT WRITE IN THIS SPACE)

Date 12-30-61Filing Fee \$ 10.00Clerk J.P.

To CHARLES F. CARPENTIER, Secretary of State, Springfield, Illinois.

6 45

The undersigned corporation, for the purpose of amending its Articles of Incorporation and pursuant to the provisions of Section 35 of the "General Not For Profit Corporation Act" of the State of Illinois, hereby executes the following Articles of Amendment:

1. The name of the corporation is: Lincoln Bible Institute
2. There are no members, having voting rights with respect to amendments:
(Insert "no" or "some")

(Strike paragraphs (a), (b), or (c) not applicable)

3. (a) ~~At a meeting of members, at which a quorum was present, held on _____, 19____, the members of the corporation present and represented by proxy have adopted the following amendment:~~

(b) ~~By a consent in writing signed by all members of the corporation entitled to vote with respect thereto,~~

(c) At a meeting of directors (members having no voting rights with respect to amendments) held on

September 30, 19 61, same receiving the votes of a majority of the directors then in office,

the following amendment or amendments were adopted in the manner prescribed by the "General Not For Profit Corporation Act" of the State of Illinois:

~~By the members of the Lincoln Bible Institute, incorporated under the laws of the State of Illinois, On and after December 30, 1961, the name of this institution, as incorporated under the laws of the State of Illinois and in the County of Logan, shall be: "Lincoln Christian College". The members of the said Lincoln Christian College shall be the members of the Lincoln Christian Seminary.~~

PAID

JAN - 2 1962

J. S. Carpenter
Secretary of State.

(Over)

IN WITNESS WHEREOF, the undersigned corporation has caused these Articles of Amendment to be executed in its name by its _____ President, and its _____ Secretary, this 30th day of _____
November, 1961



LINCOLN BIBLE INSTITUTE
 (Exact Corporate Title)

By Earle Hargrove
 Its _____ President
Leon H. Appel
 Its _____ Secretary

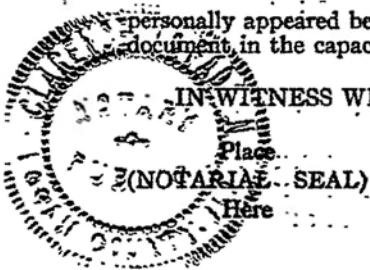
STATE OF Illinois

COUNTY OF Logan

I, Clarence McPadden, a Notary Public, do hereby certify that on the 30th day of November, 1961, Leon H. Appel
 (Acknowledgment by either officer is sufficient)

personally appeared before me and, being first duly sworn by me, acknowledged that _____ he signed the foregoing document in the capacity therein set forth and declared that the statements therein contained are true.

IN WITNESS WHEREOF, I have hereunto set my hand and seal the day and year before written.



My Commission Expires
October 26, 1964

Clarence McPadden
 Notary Public

FORM NP-A

280 404
 File

ARTICLES OF AMENDMENT
 to the
 ARTICLES OF INCORPORATION
 of
 LINCOLN BIBLE INSTITUTE

LED

DEC 30 1961

Charles S. Conforti
 Secretary of State

Filing Fee \$10.00
 (28113-10M-11-60)

File Number 2780-404-7



To all to whom these Presents Shall Come, Greeting:

Whereas, ARTICLES OF AMENDMENT TO THE ARTICLES OF
INCORPORATION OF
LINCOLN CHRISTIAN COLLEGE
INCORPORATED UNDER THE LAWS OF THE STATE OF ILLINOIS HAVE BEEN
FILED IN THE OFFICE OF THE SECRETARY OF STATE AS PROVIDED BY THE
GENERAL NOT FOR PROFIT CORPORATION ACT OF ILLINOIS, IN FORCE
JANUARY 1, A.D. 1944.

*Now Therefore, I, Jim Edgar, Secretary of State of the State
of Illinois, by virtue of the powers vested in me by law, do hereby
issue this certificate and attach hereto a copy of the Application
of the aforesaid corporation.*

In Testimony Whereof, *I thereto set my hand and cause to
be affixed the Great Seal of the State of Illinois,
at the City of Springfield, this* 8TH
day of JUNE *AD 19* 84 *and*
of the Independence of the United States
the two hundred, and 8TH.

(SEAL)

Jim Edgar

SECRETARY OF STATE

To Be Filed
in Duplicate
Filing Fee \$10.00

FORM NP-35

(DO NOT WRITE IN THIS SPACE)

Date 6/18/84Filing Fee \$ 25.00Clerk AK

ARTICLES OF AMENDMENT
to the
ARTICLES OF INCORPORATION
under the
GENERAL NOT FOR PROFIT CORPORATION ACT

To ALAN J. DIXON, Secretary of State, Springfield, Illinois:

The undersigned corporation, for the purpose of amending its Articles of Incorporation and pursuant to the provisions of Section 35 of the "General Not For Profit Corporation Act" of the State of Illinois, hereby executes the following Articles of Amendment:

1. The name of the corporation is: Lincoln Christian College

2. There are no members, having voting rights with respect to amendments:
(Insert "no" or "some")

(Strike paragraphs (a), (b), or (c) not applicable)

8. (a) At a meeting of members, at which a quorum was present, held on _____, 19____, same receiving at least two-thirds (2/3) of the votes entitled to be cast by the members of the corporation present or represented by proxy at such meeting.

(b) By a consent in writing signed by all members of the corporation entitled to vote with respect thereto,

(c) At a meeting of directors (members having no voting rights with respect to amendments) held on May 5, 1984, same receiving the votes of a majority of the directors then

in office, the following amendment or amendments were adopted in the manner prescribed by the "General Not For Profit Corporation Act" of the State of Illinois:

The name of this institution, as incorporated under the laws of the State of Illinois and in the County of Logan, shall be Lincoln Christian College and Seminary. AK

(Over)

IN WITNESS WHEREOF, the undersigned corporation has caused these Articles of Amendment to be executed in its name by its _____ President, and its _____ Secretary, this 5th day of _____ May, 19 84.



Lincoln Christian College
(Exact Corporate Title)

By Charles E. Mills
Its _____ President
Grace Barnes
Its _____ Secretary

STATE OF ILLINOIS } ss.
COUNTY OF LOGAN

I, JACK A. GETCHEL, a Notary Public, do hereby certify that on the 5th day of MAY, 19 84, CHARLES E. MILLS
(Acknowledgment by either officer is sufficient)
personally appeared before me and, being first duly sworn by me, acknowledged that _____ he signed the foregoing document in the capacity therein set forth and declared that the statements therein contained are true.

IN WITNESS WHEREOF, I have hereunto set my hand and seal the day and year before written.



Jack A. Getchel
Notary Public.

FORM NP-30	Box _____	File _____	ARTICLES OF AMENDMENT	to the	ARTICLES OF INCORPORATION	of	FILED	JUN 08 1984	SECRETARY OF STATE CORPORATION DEPARTMENT TELEPHONE: (217) 782-7880	PAID JUN 14 1984
------------	-----------	------------	-----------------------	--------	---------------------------	----	--------------	-------------	---	----------------------------

File Number 2780-404-7

State of Illinois
Office of
The Secretary of State

Whereas, ARTICLES OF AMENDMENT TO THE ARTICLES OF
INCORPORATION OF
LINCOLN CHRISTIAN COLLEGE AND SEMINARY
INCORPORATED UNDER THE LAWS OF THE STATE OF ILLINOIS HAVE BEEN
FILED IN THE OFFICE OF THE SECRETARY OF STATE AS PROVIDED BY THE
GENERAL NOT FOR PROFIT CORPORATION ACT OF ILLINOIS, IN FORCE
JANUARY 1, A.D. 1987.

Now Therefore, I, George H. Ryan, Secretary of State of the State of Illinois, by virtue of the powers vested in me by law, do hereby issue this certificate and attach hereto a copy of the Application of the aforesaid corporation.

In Testimony Whereof, I hereto set my hand and cause to be affixed the Great Seal of the State of Illinois, at the City of Springfield, this 15TH day of FEBRUARY A.D. 19 95 and of the Independence of the United States the two hundred and 19TH.



C-212.1

George H. Ryan

Secretary of State

NFP-110.30
(Rev. Jan. 1995)

Submit in Duplicate
Remit payment in Check or Money
Order, payable to "Secretary of
State."

DO NOT SEND CASH!

GEORGE H. RYAN **PAID**
Secretary of State
State of Illinois **FEB 22 1995**

ARTICLES OF AMENDMENT
under the
GENERAL NOT FOR PROFIT
CORPORATION ACT

File # 2780-404-7

This Space For Use By Secretary of State	
Date	<u>2-15-95</u>
Filing Fee	<u>2000</u>
Approved	<u>[Signature]</u>

7X

Pursuant to the provisions of "The General Not For Profit Corporation Act of 1986," the undersigned corporation hereby adopts these Articles of Amendment to its Articles of Incorporation.

ARTICLE ONE The name of the corporation is Lincoln Christian College and Seminary ✓

(Note 1)

ARTICLE TWO The following amendment to the Articles of Incorporation was adopted on November 10
1994 in the manner indicated below ("X" one box only.)

- ☒ By the affirmative vote of a majority of the directors in office, at a meeting of the board of directors, in accordance with Section 110.15. (Note 2)
- ☐ By written consent, signed by all the directors in office, in compliance with Sections 110.15 and 108.45 of this Act. (Note 3)
- ☐ By the members at a meeting of members entitled to vote by the affirmative vote of the members having not less than the minimum number of votes necessary to adopt such amendment, as provided by this Act, the articles of incorporation or the bylaws, in accordance with Section 110.20. (Note 4)
- ☐ By written consent signed by members entitled to vote having not less than the minimum number of votes necessary to adopt such amendment, as provided by this Act, the articles of incorporation, or the bylaws, in compliance with Sections 107.10 and 110.20 of this Act. (Note 5)

(INSERT RESOLUTION)

BE IT RESOLVED THE ARTICLES OF INCORPORATION OF LINCOLN CHRISTIAN COLLEGE AND SEMINARY BE AMENDED BY THE FOLLOWING ADDITIONAL PROVISION:

(See Attached Sheet)

(If space is insufficient, attach additional pages size 8 1/2 x 11)

The undersigned corporation has caused these articles to be signed by its duly authorized officers, each of whom affirm, under penalties of perjury, that the facts stated herein are true. (All signatures must be in **BLACK INK**.)

Dated February 11, 19 95

Lincoln Christian College and Seminary

attested by Tom Gerdtz, Secretary
(Signature of Secretary or Assistant Secretary)
Tom Gerdtz, Secretary
(Type or Print Name and Title)

by Charles A. McNeely
(Exact Name of Corporation)
(Signature of President or Vice President)
Charles McNeely, President
(Type or Print Name and Title)

NOTES AND INSTRUCTIONS

NOTE 1: State the true exact corporate name as it appears on the records of the Office of the Secretary of State, **BEFORE** any amendments herein reported.

NOTE 2: Directors may adopt amendments without member approval only when the corporation has no members, or no members entitled to vote.

NOTE 3: Director approval may be (1) by vote at a director's meeting (either annual or special) or (2) consent, in writing, without a meeting.

NOTE 4: All amendments not adopted under Sec. 110.15 require (1) that the board of directors adopt a resolution setting forth the proposed amendment and (2) that the members approve the amendment.

Member approval may be (1) by vote at a members meeting (either annual or special) or (2) by consent, in writing, without a meeting.

To be adopted, the amendment must receive the affirmative vote or consent of the holders of at least 2/3 of the outstanding members entitled to vote on the amendment, (but if class voting applies, then also at least a 2/3 vote within each class is required).

The articles of incorporation may supersede the 2/3 vote requirement by specifying any smaller or larger vote requirement not less than a majority of the outstanding votes of such members entitled to vote and not less than a majority within each when class voting applies. (Sec. 110.20)

NOTE 5: When a member approval is by written consent, all members must be given notice of the proposed amendment at least 5 days before the consent is signed. If the amendment is adopted, members who have not signed the consent must be promptly notified of the passage of the amendment. (Sec. 107.10 & 110.20)

FORM NFP-110.30

File No.

ARTICLES OF AMENDMENT
under the
GENERAL NOT FOR PROFIT
CORPORATION ACT

Filing Fee \$25

Filing Fee for Re-Statement Articles \$100

FILED

FEB 15 1995

GEORGE H. RYAN
SECRETARY OF STATE

RETURN TO:

Department of Business Services
Secretary of State
Springfield, Illinois 62756
Telephone (217) 782-1832

C-130.7

"Upon the dissolution of the corporation, the Board of Trustees shall, after paying or making provision for the payment of all of the liabilities of the corporation, dispose of all of the assets of the corporation exclusively for the purpose of the corporation in such a manner, or to such organization or organizations organized and operated for religious purposes as shall at the time qualify as an exempt organization or organizations under Section 501(c)(3) of the Internal Revenues Code of 1954 (or the corresponding provision of any future United States Internal Revenue Law), as the Board of Trustees shall determine. Should the Board of Trustees fail or refuse to make such distribution within a reasonable time or within the time specified by law for such distribution, the Board of Partnership Representatives of Lincoln Christian College and Seminary shall make such distribution. Any such assets not disposed of shall be disposed of by the Circuit Court of the Eleventh Judicial Circuit, Logan County, Illinois, or any successor trial court of the State of Illinois having jurisdiction over Logan County, Illinois. The Board of Trustees, the Board of Partnership Representatives and the court shall, in making distribution of the assets, distribute such assets to: (1) a Bible college or Bible colleges conducted and supported by the Christian Churches and Churches of Christ in the United States, such as, but not limited to, Ozark Christian College, Joplin, Missouri; Johnson Bible College, Kimberlin Heights, Tennessee; Cincinnati Bible College and Seminary, Cincinnati, Ohio; Great Lakes Bible College, Lansing, Michigan; St. Louis Christian College, St. Louis, Missouri; and Central Christian College of the Bible, Moberly, Missouri; or (2) an organization or organizations conducted and supported by the Christian Churches and Churches of Christ in the United States which have also supported Lincoln Christian College and Seminary."

FORM **NFP 110.30** (rev. Dec. 2003)
ARTICLES OF AMENDMENT
 General Not For Profit Corporation Act

Jesse White, Secretary of State
 Department of Business Services
 501 S. Second St., Rm. 350
 Springfield, IL 62756
 217-782-1832
 www.cyberdriveillinois.com



FILED
JUL 2 - 2009

Remit payment in the form of a
 check or money order payable
 to Secretary of State.

JESSE WHITE
SECRETARY OF STATE

File #

N2780-404-7

Filing Fee: \$25

Approved: [Signature]

----- Submit in duplicate ----- Type or Print clearly in black ink ----- Do not write above this line -----

1. Corporate Name (See Note 1 on back.): Lincoln Christian College and Seminary

2. Manner of Adoption of Amendment:

The following amendment to the Articles of Incorporation was adopted on May 9, 2008 in the man-
 ner indicated below (check one only):

- ☒ By affirmative vote of a majority of the directors in office, at a meeting of the board of directors, in accordance with Section 110.15. (See Note 2 on back.)
- ☐ By written consent, signed by all the directors in office, in compliance with Sections 110.15 and 108.45. (See Note 3 on back.)
- ☐ By members at a meeting of members entitled to vote by the affirmative vote of the members having not less than the minimum number of votes necessary to adopt such amendment, as provided by this Act, the Articles of Incorporation or the bylaws, in accordance with Section 110.20. (See Note 4 on back.)
- ☐ By written consent signed by members entitled to vote having not less than the minimum number of votes necessary to adopt such amendment, as provided by this Act, the Articles of Incorporation, or the bylaws, in compliance with Sections 107.10 and 110.20. (See Note 5 on back.)

3. Text of Amendment:

(a.) When an amendment effects a name change, insert the new corporate name below. Use 3(b.) below for all other amendments. *Article 1: The Name of the Corporation is:

Lincoln Christian University

New Name

(b.) All amendments other than name change.

If the amendment affects the corporate purpose, the amended purpose is required to be set forth in its entirety. If there is not sufficient space to add the full text of the amendment, attach additional sheets of this size.

None

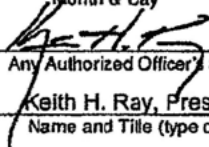
P A I D
JUL 06 2009

**DEPARTMENT OF
 BUSINESS SERVICES**

Printed by authority of the State of Illinois. July 2007 - 10M - C 130.17

4. The undersigned Corporation has caused these Articles to be signed by a duly authorized officer who affirms, under penalties of perjury, that the facts stated herein are true and correct.

All signatures must be in BLACK INK.

Dated June 29, 2009 Lincoln Christian College and Seminary
Month & Day Year Exact Name of Corporation

Any Authorized Officer's Signature
Keith H. Ray, President
Name and Title (type or print)

5. If there are no duly authorized officers, the persons designated under Section 101.10(b)(2) must sign below and print name and title.

The undersigned affirms, under penalties of perjury, that the facts stated herein are true.

Dated _____
Month & Day Year

_____ Signature	_____ Name and Title (print)
_____ Signature	_____ Name and Title (print)
_____ Signature	_____ Name and Title (print)
_____ Signature	_____ Name and Title (print)

NOTES

- State the true and exact corporate name as it appears on the records of the Secretary of State BEFORE any amendment herein is reported.
- Directors may adopt amendments without member approval only when the corporation has no members, or no members entitled to vote pursuant to §110.15.
- Director approval may be:
 - by vote at a director's meeting (either annual or special), or
 - by consent, in writing, without a meeting.
- All amendments not adopted under Sec. 110.15 require that:
 - the board of directors adopt a resolution setting forth the proposed amendment, and
 - the members approve the amendment.

Member approval may be:

- by vote at a members meeting (either annual or special), or
- by consent, in writing, without a meeting.

To be adopted, the amendment must receive the affirmative vote or consent of the holders of at least two-thirds of the outstanding members entitled to vote on the amendment (but if class voting applies, also at least a two-thirds vote within each class is required).

The Articles of Incorporation may supersede the two-thirds vote requirement by specifying any smaller or larger vote requirement not less than a majority of the outstanding votes of such members entitled to vote, and not less than a majority within each class when class voting applies. (Sec. 110.20)

- When member approval is by written consent, all members must be given notice of the proposed amendment at least five days before the consent is signed. If the amendment is adopted, members who have not signed the consent must be promptly notified of the passage of the amendment. (Sec. 107.10 & 110.20)

Printed by authority of the State of Illinois. July 2007 - 10M - C 130.17

File Number 2780-404-7



To all to whom these Presents Shall Come, Greeting:
I, Jesse White, Secretary of State of the State of Illinois, do hereby certify that I am the keeper of the records of the Department of Business Services. I certify that

THE FOREGOING AND HERETO ATTACHED IS A TRUE
AND CORRECT COPY, CONSISTING OF 16 PAGES, AS TAKEN FROM THE
ORIGINAL ON FILE IN THIS OFFICE FOR LINCOLN CHRISTIAN UNIVERSITY. **



In Testimony Whereof, I hereto set
my hand and cause to be affixed the Great Seal of
the State of Illinois, this 4TH
day of MAY A.D. 2012

Jesse White

Authentication #: 1212500245
Authenticate at: <http://www.cyberdriveillinois.com>

SECRETARY OF STATE

Attachment B: Mission Statement, Core Values, and Statement of Faith

Mission Statement

Lincoln Christian University is a Christian higher education community whose mission is to nurture and equip Christians with a Biblical worldview to serve and lead in the church and the world.

Core Values

We believe our highest privilege is to glorify God, serve His Son, and rely upon His Holy Spirit. To that end we pledge ourselves to these core values:

- f. *Authentic community* that fosters Christian character, conduct, accountability, and unity amidst growing diversity.
- g. *Holistic development* of students in and out of the classroom as spiritually mature and academically prepared lifelong learners.
- h. *Servant leadership* and its focus on leading and learning through serving, based on one's gifts, passion, and sense of calling.
- i. *Responsible stewardship* of the abilities and resources that God provides for and through His people.
- j. *Our Restoration heritage* and its plea for Christian unity and Biblical authority in carrying out God's global mission.

Statement of Faith

Lincoln Christian University is a private religious institution affiliated with independent Christian Churches and Churches of Christ. These churches arose from the "Restoration Movement" begun in the early 19th century on the American frontier under the leadership of such men as Barton Stone and Alexander Campbell. Churches within the Stone-Campbell heritage seek to honor Jesus' prayer in John 17, promoting world evangelism by practicing unity in the church based upon the restoration of Biblical authority and the essential elements of New Testament Christianity. This movement refuses to embrace extra-biblical creeds as tests of fellowship, standing on the Scriptures alone as the foundation for faith and practice. Furthermore, each congregation is self-governing under Christ, so individual churches may differ from one another on non-essentials. Therefore, the statements that follow are descriptive, not creedal—designed to help people understand the positions generally held by Christian Churches and Churches of Christ, including Lincoln Christian University. We believe that:

- **God** is one being in three persons—God the Father, God the Son, and God the Holy Spirit. He is the source of all creation (Gen. 1:1; John 1:1-2), which He sustains (Col. 1:17) and is in the process of redeeming (Rom. 8:19-22). God the Father loves us and desires that we have fellowship with Him as His children (1 John 1:3).
- **Jesus** of Nazareth is the incarnation of God the Son. He is the Word become flesh (John 1:14), and He now holds all authority in heaven and on earth (Matt. 28:18). He is Savior and Lord. He made human salvation possible through His life, death on the cross, and resurrection. He ascended into heaven where He is now our high priest and advocate. He is head of the Church.
- **The Holy Spirit** works actively in the world, seeking to glorify Jesus. The Holy Spirit convicts people of sin, righteousness, and judgment to come (John 16:5-11). The Holy Spirit indwells believers individually and corporately in the Church. The Holy Spirit develops within the Christian a pure heart which results in Christ-like character expressed in private and public conduct and action.
- **The Bible**, the Old and New Testament Scriptures, is the uniquely inspired Word of God (2 Tim. 3:14-17; 2 Peter 1:16-21). The Bible is the rule of faith and practice for Christians. We affirm that Scripture is the authoritative revelation from God by which we know God's will and Christ's authority. We seek to assert what the Scriptures clearly assert and allow freedom in other cases. We seek to understand divine intent, through authorial intent, and we seek to apply its teaching to the contemporary church and culture.

- **The Church** is the body of Christ on earth, the community of believers throughout the world. Upon surrender to Christ, a person is added to the Church. In addition, the priesthood of all believers means each Christian is called to be a serving minister (1 Peter 2:9-10). The Church's mission is the Great Commission (Matt. 28:18-20).
- **Human beings** were created by God to walk in fellowship with Him. However, all (except Jesus) have sinned and fall short of the glory of God (Rom. 3:23) and must rely on God's grace and forgiveness. Every human from the moment of life is in the image of God (*imago dei*), a person to be nurtured, protected, and developed.
- **Salvation** is by God alone through Jesus Christ alone. One accepts Christ as Savior through a conversion process that includes faith, repentance, confession, and baptism (Acts 2:38, 8:12, 10:47-48, Rom. 10:9, etc.).
- In **baptism** a believer is immersed, crucified and buried with Christ (Rom. 6:3-4), receives forgiveness of sin and the gift of the Holy Spirit (Acts 2:38), is resurrected (Col. 2:12) and clothed with Christ (Gal. 3:27), and becomes saved (1 Peter 3:21) because of God's free gift of grace received by faith.
- **The Lord's Supper** is the celebration of the New Covenant, in which the Christian community remembers Christ and celebrates the covenantal relationship they have with Him and with each other. Congregations in this fellowship typically celebrate the Lord's Supper at least weekly (1 Cor. 11:17-34; Acts 20:7).
- **The Final Coming** of Jesus is a time when Christ will personally come again as savior and judge of the world. At that time there will be the bodily resurrection of the dead—believers to eternal life with God and unbelievers to eternal judgment. Sin will be no more and believers will live in fellowship with God forever (1 Thess. 4:13-18 and Rev. 20:11-15).

Attachment C: Referenced Policies

Undergraduate Student Handbook

Section 200: Church Participation (Required)

All students are expected to be a regular part of a Christian congregation as their primary worshipping body.

Graduate and Seminary Student Handbook

Section 200: Church Participation

All students are expected to be a regular part of a Christian congregation as their primary worshipping body.

Faculty Handbook

3.4 Teaching Faculty Member Job Duties

A teaching faculty member is expected to engage in three pursuits: teaching, research and public service. Though each faculty member has his or her own strengths, in general, the University expects a faculty member to be knowledgeable of the subject and topics they teach, utilize appropriate (and appropriately varied) teaching styles and methods, make reasonable efforts to aid student retention and success, keep course materials, texts and syllabi up to date, make effective use of instructional technology, provide timely grading and feedback to students, integrate Biblical worldview implications with course content, assess and use the results of assessment to improve teaching, model and enforce classroom decorum and respect for others, provide clear and timely communication to students, stay current in their academic discipline, engage in their academic discipline, engage in discipline-appropriate research and publication/presentation, engage in discipline-appropriate public service, be accessible to students by office hours and email, demonstrate commitment to holistic student growth, engage in student community and activities, cultivate appropriate relationships with students, provide helpful and accessible academic advising, make reasonable efforts to support University recruitment efforts, make reasonable efforts to aid library collection and development, cultivate appropriate relationships with colleagues, hold classes regularly, be knowledgeable and comply with University policies, maintain a positive attitude toward work and others, be adaptable and flexible in meeting University needs, maintain appropriate personal appearance at work, participate meaningfully in shared governance responsibilities, engage in faculty community and activities, be reliable and follow through on commitments made, provide clear and timely communication to colleagues, attend chapel regularly, maintain active membership in a church (independent Restoration Movement, unless exempt), model spiritual maturity, cultivate appropriate relationships with church constituents and encourage constituent churches to engage with the University.

Staff Handbook

3.5 Church Relations

All LCU employees are expected to maintain active membership in a church (independent Restoration Movement, unless exempted by the President), model spiritual maturity, cultivate appropriate relationships with church constituents and encourage constituent churches to engage with the University.

Board of Trustees Policies

Policy Type: Governance Process

Title: Board Composition

1. **Purpose:** The purpose of articulating the Board Composition requirements is to establish an exemplary Board of Trustees for Lincoln Christian University capable of leading the University with distinction.

2. **Board Composition:**
 - a. The Board shall consist of the President of LCU (as an *ex-officio*, non-voting member) and 9 – 11 other trustees.
 - b. Every trustee shall be a member of a Christian Church/Church of Christ (undenominational) and they shall be committed to the values of the Board and the mission/vision of LCU.
 - c. The Board shall recruit members with a variety of experiences, backgrounds, and skill sets, identifying men and women who are diverse with respect to race, ethnicity, culture, and age.
 - d. Special efforts shall be made to select individuals with the following backgrounds for representation on the Board: ministry, finance, higher education, LCU alumni, and a minimum of two Seminary-trained trustees* (at least one being a Lincoln Christian Seminary graduate).
 - e. To be considered for Board membership, a potential candidate shall be independent; that is, the candidate shall meet the independence qualifications identified in the Conflicts of Interest Policy of the Lincoln Christian University Board of Trustees Policy Manual. (This independence prohibition does not apply to the President, who specifically serves in the dual status of Board member and employee of the institution.)
 - f. Any individual found to have previously breached his/her fiduciary duties in any manner shall be prohibited from serving on the Board.

3. **Terms:**
 - a. The term of a trustee shall be five years or less.
 - b. All trustee terms begin and end upon the adjournment of the Spring meeting.

4. **Vacancies:**
 - a. When a vacancy on the Board occurs due to death, resignation, removal, incapacity, etc., and such removal results in fewer than nine trustees, it shall be filled as soon as practicable, utilizing the ordinary process on an expedited timetable as designated by the Board Chair. A vacancy not resulting in fewer than nine trustees may be filled using the expedited process or the ordinary process at the discretion of the Board Chair following conferral with the Nominations Team Chair.
 - b. The term of a replacement trustee shall be the remaining portion of the year in which the vacancy of the replacement trustee occurs following board approval of the replacement trustee, plus four years and ending at a Spring meeting unless otherwise specified by the Board of Trustees.



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE FOR CIVIL RIGHTS

THE ASSISTANT SECRETARY

April 5, 2022

Silas L. McCormick
President
Lincoln Christian University
100 Campus View Dr.
Lincoln, IL 62656

Dear President McCormick:

I write in response to your January 27, 2022, letter to the U.S. Department of Education's Office for Civil Rights (OCR), in which you requested assurance of a religious exemption from Title IX of the Education Amendments of 1972, 20 U.S.C. §§ 1681-1688 (Title IX), for Lincoln Christian University ("the University") in Lincoln, Illinois.

Title IX prohibits discrimination on the basis of sex in any education program or activity operated by a recipient of Federal financial assistance. Title IX and its implementing regulations at 34 C.F.R. § 106.12 provide that Title IX does not apply to an educational institution controlled by a religious organization to the extent that the application of Title IX would be inconsistent with the controlling organization's religious tenets. Section 106.12(b) of the Department's Title IX regulations describe the process by which an educational institution may request assurance of a religious exemption. The request must identify the religious organization that controls the educational institution and specify the tenets of that organization and the provisions of the law or regulation that conflict with those tenets. Section 106.12(c) of the Department's Title IX regulations describes the evidence that is sufficient to establish that an educational institution is controlled by a religious organization.

Your letter states that the University was incorporated as Lincoln Bible Institute in 1944. Your letter explains that "Lincoln Christian University is a Christian higher education community whose mission is to nurture and equip Christians with a Biblical worldview to serve and lead in the church and the world." The letter states that the University is affiliated with independent Christian Churches and Churches of Christ, which arose from the Restoration Movement in the early 19th century. Based upon your letter and the associated materials cited therein, OCR understands the University's position to be that the University is controlled by its Board of Trustees.

Your letter included the University's Mission Statement, Core Values, and Statement of Faith. The letter explains that every trustee, employee, and student is required to make a profession of faith in Christ as a requirement of admission, employment, or affiliation, and all are required to be an active member of a church. The University notes that it has certain "behavioral expectations" of their students that are linked to their interpretation of scripture, which the University views as "divinely inspired, mandatory authority."

Your letter states that "some of the protections that have been held to exist in Title IX, particularly for LGBTQ+ students, conflict fundamentally with our religious beliefs." In particular, the University asserts that "being required to adopt Title IX's interpretation of identity as including sexuality would be inconsistent with our Christian understanding of identity." In addition, the University states that "to the extent that Title IX would prohibit us from disciplining students who engage in romantic relationships or engage in sexual activity with a member of the same sex, or reject these teachings and choose to transition from one sex to another, that would be inconsistent with our understanding of behavioral expectations of Christians." The University has a Sexual Immorality policy in its Student Handbook that prohibits "premarital sex, extramarital sex, homosexual activity, gender modification, and any other sexual activity outside the bounds of a Biblical marriage," as well as "erotic physical contact outside the traditional definition of sexual intercourse." The University also has a Sexual Immorality policy for employees that prohibits "sexual activity in violation of the law, outside the marriage covenant, between members of the same sex, or otherwise in violation of Scripture (as determined by the Board of Trustees)."

For the above reasons, Lincoln Christian University requests assurance of its exemption from the following regulatory provisions to the extent that application of these provisions conflicts with its religious beliefs.

- 34 C.F.R. § 106.21 (admission)
- 34 C.F.R. § 106.22 (preference in admission)
- 34 C.F.R. § 106.23 (recruitment)
- 34 C.F.R. § 106.31 (education programs or activities)
- 34 C.F.R. § 106.32 (housing)
- 34 C.F.R. § 106.33 (comparable facilities)
- 34 C.F.R. § 106.34 (access to classes and schools)
- 34 C.F.R. § 106.36 (counseling)
- 34 C.F.R. § 106.37 (financial assistance)
- 34 C.F.R. § 106.38 (employment assistance to students)
- 34 C.F.R. § 106.39 (health and insurance benefits and services)
- 34 C.F.R. § 106.40 (marital or parental status)
- 34 C.F.R. § 106.41 (athletics)
- 34 C.F.R. § 106.42 (textbooks and curricular material)
- 34 C.F.R. §§ 106.51-61 (relating to employment)

Lincoln Christian University is exempt from these provisions to the extent that application of these provisions conflicts with its religious beliefs.

Please note that this letter should not be construed to grant exemption from the requirements of Title IX and the regulations other than as stated above. In the event that OCR receives a complaint against your institution, we are obligated to determine initially whether the allegations fall within the exemption here recognized.

I hope this letter fully responds to your request. If you have any further questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Lhamon', with a stylized, flowing script.

Catherine E. Lhamon
Assistant Secretary for Civil Rights